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Reply To
Attn Of: HW-112

Dennis Stefani
Chemical Processors, Inc.
2203 Airport Way South, Suite 400
Seattle, Washington 98134

Dear Mr. Stefani:

We have reviewed the results of the Hydrogeologic Investigation for the Pier 91 facility conducted pursuant to the 3013 Order. Our comments on this investigation are attached.

Based upon our review of the results of this investigation it is apparent that sufficient soil and groundwater contamination exists at the facility to warrant corrective action. This will need to be addressed through a RCRA 3008(h) corrective action order. The facility's status on the CERCLA Offsite List may be affected depending on how long it takes to reach consensus on an order.

We would like to schedule a meeting to discuss corrective action at the Pier 91 facility and answer any questions you or your staff may have. Please contact Chuck Shenk, Chief of the RCRA Compliance Section, at 442-0695 to make arrangements for this meeting.

Sincerely,

Michael F. Gearheard, Chief
Waste Management Branch

Enclosure

cc: Julie Selleck, Washington Department of Ecology
Tim Nord, Washington Department of Ecology
Dave Aggerholm, Port of Seattle

USEPA RCRA



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COMMENTS ON HYDROGEOLOGIC INVESTIGATION REPORT
Chempro - Pier 91

1. The soil samples showing the highest contamination were obtained from Borings TB-2, TB-4 and TB-7. However, monitoring wells to examine underlying groundwater were not placed in the immediate vicinity of these borings. Additional groundwater wells will be necessary to fully monitor groundwater quality near these boring locations.
2. Soil and groundwater under the tank farms are in need of further investigation to provide useful information for a detailed site assessment.
3. According to the report, water levels in the shallow aquifer wells did not respond to the tidal fluctuation in Elliot Bay. The reason for the absense of tidal effect is not discussed.
4. Figure 3-4 graphically expresses that the change in water level in the deep aquifer is a function of distance from Elliot Bay. The graph implies that the tidal influence vanishes 400 ft from the shore in the deep aquifer; however, supporting data for this calculation was not presented.
5. In Section 3.3.1 (page 48), the conductivity unit is expressed in "U S/cm". How is this unit equivalent to the commonly used unit of mmhos/cm or umhos/cm?
6. Soil samples for analysis of volatile organic compounds were composited. This procedure was not appropriate because volalization may have occurred during the compositing process.
7. Boring SB-2 should not be designated as a background quality boring because of trace amounts of halogenated and aromatic hydrocarbons were detected in the soil samples. These contaminants are suspected to have originated at the facility.